

### **REMARKS**

Claims 1-10 remain pending in this application. Claims 1, 4, 6, 9, and 10 have been amended by this response. The amendments have been made to clarify the claimed subject matter. Support for the amendments made to Claims 1 and 6, specifically, are found in FIG. 1 and the related text in the specification.

The amendments made to Claims 4 and 9, where the Examiner wanted the term IGMP to be spelled out completely at least once in the claim has been performed. Applicants kindly request that the Examiner remove this objection to these claims.

### **Rejection of claims 1-10 under 35 U.S.C. 102(e)**

Claims 1-10 are rejected under 35 U.S.C. 102(e) as being anticipated by Mahajan et al. (US 6785274 B2, hereafter referred to as 'Mahajan'). The Applicants disagree with the Examiner's rejection for the following reasons:

In the previous communication, Mahajan et al corresponds to US6735201. The Examiner indicated that the switch of Mahajan et al was the element 402.

In the current communication, Mahajan et al corresponds to US6785274, from which US6735201 is a continuation application. It discloses the same structure as US6735201. Now, the Examiner indicates that the switch is the element 300. The examiner indicates that the bridge function is the bridge forwarding engine 408.

With the current amendment to Claims 1 and 6, it is unclear what the multicast group management module is in Mahajan. Applicants assume that

the equivalent structure to be the Resolution Engine RE (412) to which the engine (410) forwards the signals as indicated in col 10 lines 18-40. It also indicates that the step of checking is performed at the CFE (314). That is, all of these components are within the switch.

According to the Examiner, the switch is going to be the routing device. If we consider that the switch device as the routing device in Mahajan, then Mahajan discloses that the bridge function and the multicast group management module are in the switch. This compares to the elements of Claim 1 and 6 where such components are separate.

In other words, Mahajan discloses a method for routing data packets in a routing device (300) connecting a first network (210) and a second network (220), the routing device [being] ~~comprising a switch, a bridge function and a multicast group management module,~~ (the strikeouts being the structure in Claim 1 which is not found in Mahajan as separate elements).

Mahajan et al discloses a method comprising the steps, at the switch, of:

(a) receiving a frame from a device connected to the first network;  
(col 5 lines 5-15)

~~(b) forwarding the frame to the bridge function; wherein the bridge function is performed by a means for forwarding a frame based on a destination address of the frame;—(As the bridge function is included in the switch, the switch doesn't forward the frame to the bridge function.)~~

(c) checking whether the frame contains a multicast group management message and in the affirmative, creating a new frame (col 10 lines 18-40) ~~comprising as destination address the destination address of the multicast group management module and as~~ payload at least the multicast management data of the received frame; and

(d) ~~forwarding this new frame to the bridge function.~~ (as the multicast group management module is included in the switch, the switch doesn't forward the new frame to that module)

To reiterate the point from d above, there would be no forwarding function performed, nor would the destination address of the multicast group module be used in Mahajan because the switch, bridge function, and multicast group management module are all within the same switch. Hence, none of the functions would take place nor would they be needed in the switch of Mahajan.

Therefore Claim 1 and 6 are new in view of Mahajan as the reference does not disclose or suggest the independent elements of structure and their associated functions as in the present invention..

The other cited prior art is not relevant:

US2003123453 deals with directing multicast traffic in an Ethernet MAN using a multicast-VLAN and IGMP. It doesn't disclose any structure and method such as Claim 1.

US6457059 deals with multicast data transmission in a LAN switching device. That device is depicted in Figures 2 and 3. It discloses a multicast packet processing section 102 that comprising a multicast packet determining section 201, adapted to perform packet transfer, and an IGMP determining section 203 for executing processing according to the IGMP message type, col 8 lines 15-31. The reference doesn't disclose creating the new frame of Claim 1.

US6778547 deals with improving throughput in a switching device 12 comprising a decision making engine 40. It discloses the multiport switch in

Figure 2. It comprises an internal rule checker 40 that comprises a parsing state machine further described in col 11 line 62 to col 12 line 49. It discloses a step of checking in Fig 7. However the reference doesn't disclose creating a new frame such as in Claim 1 nor does the reference disclose the routing device of Claim 1.

Claims 1 and 6 are therefore deemed to be patentable. Dependent Claims 2-5 are concerned to be allowable as such claims dependent on allowable Claim 1. Also, dependent claims 7-10 are dependent on Claim 6 and are considered patentable for the reasons set forth above regarding Claim 6. Therefore, it is respectfully submitted that the rejection to all of the pending claims be withdrawn.

Having fully addressed the Examiner's rejections, it is believed that, in view of the preceding amendments and remarks, this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, the Examiner is invited to contact the applicant's attorney at the phone number below, so that a mutually convenient date and time for a telephonic interview may be scheduled.

Respectfully submitted,  
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